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Federal Communications Commission
in re: RM-10352
date: 15 Jan 2002

Ammended comments from an affected party

Actual language of this petition could not be found on the FCC site; previous comments reacted to public reports of the proposal. These were misleading. Direct contact with the petitioners remedied the problem, prompting this submission.

I support Briggs & Tippett's proposal for wideband/narrowband mode separation on the 1.8 MHz amateur band. However, I recommend the separation point be 1845KHz, rather than 1843KHz, as requested.

This will provide a guard band between high power SSB and the weak signal CW window at 1830-1840. IMD products from properly operating LSB transmitters on 1843kHz can still result in significant energy at 3kHz from the suppressed carrier frequency. Adoption of 1845kHz will remedy that problem.

I urge swift approval of the simple modal-division proposed in RM-10352, with that one modification. The Briggs/Tippet proposal is summarized below, with the noted change:

Executive Summary

Purpose: This is a petition for proposed FCC rulemaking regarding the 160 m Amateur Radio Service band.

What is Being Requested: It is respectfully requested that the FCC adopt rulemaking creating a sub-band for wideband modes (SSB, AM, SSTV) within the 160 m amateur band from 1.845-2.000 MHz inclusive. Narrowband modes, as defined within Part 97 regulations, should continue to be authorized across the entire band from 1.800 - 2.000 MHz. The intent of this action is to separate wideband and narrowband modes in the region from 1.800 - 1.845 MHz.

Specifically, we request that only *Frequencies* for *Phone, image* in Part 97.305c be ***changed*** from *Entire band* to ***1.845-2.000 MHz*** as indicated below in the regulation:

Band Frequencies Emission types authorized Standards Part 97.307(f), Paragraph 160 m ***1.845-2.000 MHz*** Phone, image (1), (2)

This will also serve to benefit SSB operations, as it will separate weak international signals from strong domestic US signals. Amateurs in other countries can still transmit SSB in the weak signal area. This separation of transmit and receive frequencies for US domestic SSB will reduce channel-contention, and increase the probability of international communications using voice modes.

Additionally, experimentation with PSK31 and other narrowband digital modes can continue in the 1810-1815 window, without risk of assault by strong SSB signals during competitive activities.

RM-10352 therefore contains a lot of good for all concerned. Further, it serves to codify one of the key principals of the ARRL bandplan, in an enforceable fashion. By adopting this petition, you will, in effect, be ratifying the role of ARRL in developing cooperative uses of frequency space.

Further, by separating narrow and wideband modes, you will harmonize the 1.8 MHz allocation with those of the other HF amateur bands. I urge swift adoption, with the noted modification.

Thank you for your consideration.

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P1-2-32789 (retired)